

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GILBERTO PEREIRA BRITO, FLORENTIN)
AVILA LUCAS, JACKY CELICOURT,)
Petitioners,)
v.) C.A. No. 1:19-CV-11314-PBS
WILLIAM P. BARR, U.S. Attorney General, et al.,)
Respondents.)

**MOTION TO EXTEND RESPONDENTS' DEADLINE TO COMPLY WITH THE
COURT'S ORDER AND FILE A CERTIFICATION OF COMPLIANCE**

Respondents request a 14-day extension of their deadline to comply with part of the Court's November 27, 2019 order (November 27 Order) and with their deadline to file a notice of compliance. Petitioners oppose to this extension request. Respondents make this request in good faith and not for the purpose of delay as set forth herein:

1. On November 27, 2019, the Court granted Petitioners' motion for summary judgment and motion to modify the class definitions. ECF No. 88 at 22. In that order, the Court granted both declaratory and injunctive relief. Respondents now request a 14-day extension of the compliance deadlines in the following three paragraphs.

2. First, the Court declared that aliens detained pursuant to 8 U.S.C. § 1226(a) are entitled to receive bond hearings at which the Government must prove the alien is either dangerous by clear and convincing evidence or a risk of flight by a preponderance of the evidence and that no condition or combination of conditions will reasonably assure the alien's future appearance and the safety of the community. *Id.* At the bond hearing, the immigration judge ("IJ") must evaluate the alien's ability to pay in setting bond above \$1,500 and must